

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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IN RE APACHE CORP. SECURITIES  
LITIGATION

Case No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**[PROPOSED] ORDER REGARDING DISCOVERY DISPUTES**

After considering the parties' letter briefs submitted in connection the parties' discovery disputes, the Court orders the following:

1. The parties are to comply with Lead Plaintiffs' Proposed Discovery Protocol Regarding Production of ESI and Paper Documents, which the Court will enter as an order.
2. Defendants shall employ a search methodology for the identification of documents responsive to Plaintiffs' discovery requests that can identify and capture all relevant file types and can be validated, and shall meet and confer with Plaintiffs on these solutions at least bi-weekly. The parties shall also meet and confer regarding the search terms to be applied to Defendants' search for responsive documents, and to disclose therein relevant metrics, including unique hit counts, based on a de-duplicated data set.
3. The parties shall make bi-weekly reports to the Court identifying progress made regarding the negotiation of a reasonable search protocol and any issues that require Court intervention, with a deadline of April 28, 2023, to reach agreement or present any unresolved issues to the Court for resolution.

4. Defendants shall immediately commence rolling productions of relevant documents that may be identified without resort to ESI methodologies, including but not limited to Board materials, annual audit files, and presentations and reports related to Project Neptune, and to complete such productions by April 28, 2023.

5. The fact discovery deadline will be extended to six months following the deadline for Defendants to substantially complete their document production. The parties shall submit a proposed amended scheduling order within seven (7) days of this order reflecting that change and any necessary changes to subsequent dates.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

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THE HONORABLE ANDREW M. EDISON  
UNITED STATES MAGISTRATE JUDGE